Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Digital Audio Broadcasting Systems	)	MM Docket No.99-325
And Their Impact On The Terrestrial	)	
Radio Broadcast Service	)	

THESE COMENTS ARE IN RESPONSE TO PUBLIC NOTICE DA 02-889 CONCERNING THE NRSC "EVALUATION OF THE IBIQUITY DIGITAL CORPORATION IBOC SYSTEM".

TO: The Commission

COMMENTS OF SUSQUEHANNA RADIO CO.
CONCERNING THE POTENTIAL OF AM IBOC.

These comments are filed in response to the Public Notice DA 01-899 issued April 19, 2002 concerning the NRSC evaluation of the iBiquity Digital Corporation AM IBOC system. Susquehanna Radio Corp. is a privately held company that has served the public as a radio broadcast licensee for 60 years. Susquehanna owns and operates 12 AM and 20 FM stations.

Susquehanna has been a strong supporter of the In-Band/On-Channel (IBOC) concept since the idea was first conceived. Throughout the development of both the iBiquity FM and AM systems, Susquehanna has become convinced that IBOC and only IBOC can move radio broadcasting into the digital domain in a timely and orderly fashion with minimal cost and disruption to existing services and most importantly, no need for allocation of new spectrum for this service.

Susquehanna personnel participated in the development of the NRSC AM evaluation report and share in its conclusion, "… that AM broadcasters have an opportunity to benefit significantly from this technology". Stereo broadcasting with quality similar to that of existing FM is now possible in the AM band and the adoption of AM IBOC can reverse the downward trend experienced by AM broadcasters for so many years.

Susquehanna recognizes that AM IBOC is not without its shortcomings. Potential does exist for additional interference to the analog service of adjacent channel stations but the benefits of IBOC far outweigh the additional interference that may be received by some AM stations. The problem with AM is that it is not a pristine service. This service that served our country for so many years has suffered from an allocation scheme which squeezed in new and needed stations during its growth years, the propagation of the medium itself, and from the vary nature of Amplitude Modulation. Today, AM reception suffers from co-channel and adjacent channel interference, atmospheric noise, and a host of manmade noise sources. Amplitude Modulation by its very nature is susceptible to interference from the wires that run along our streets, our lighting systems, large telephone systems and so many electronic devices that never existed during the growth years of AM.

To combat the increase in interference within the AM band receiver manufacturers began to build their receives with narrower bandwidth which severely limited the fidelity of AM reception. Nearly ten years ago the commission required all AM stations to install a NRSC filter to limit bandwidth excursions in the hope that the receiver manufactures would provide wider bandwidth receivers to enhance the listening quality. This has not occurred and there is evidence that many of today's receivers have even narrower bandwidth.

Susquehanna believes that the iBiquity AM IBOC system meets all of the ten criteria stated in the original Notice of Proposed rule making. AM IBOC requires no new allocation system and by its very nature provides accommodation for all existing AM broadcasters. Each existing AM broadcaster can enter the digital domain on its own schedule by simply adding the IBOC digital signal to its existing authorized facility. AM IBOC utilize the transmission facilities and towers of existing stations requiring no new transmitting sites.

Today, the commission is faced with the decision of authorizing a fundamental change in the AM broadcasting that may cause additional interference to some existing stations in areas on the fringe of their coverage. Susquehanna believes that this potential interference is minimal when compared to the quality and durability grains that will occur in every station's main listening and marketing area. Today, for the most part, AM radio programming has become relegated to talk formats only and IBOC can bring back high quality music to the AM band. Susquehanna believes that the tradeoff offered by IBOC; a potential increase in adjacent channel interference in order to achieve a high quality and durable audio service in its main listening area, is in the best interest of AM broadcasters and the listening public.

The NRSC evaluation reports on both the AM IBOC and the FM IBOC called attention to the potential of adjacent channel interference and recognized that neither system was perfect. Tradeoffs occur but the gains of the system far outweigh the losses. AM allocations and propagation are far more complex than FM making it more difficult to fully ascertain the extent of this adjacent channel interference particularly during night hours.

Susquehanna recognizes that no broadcast service is optimum when authorized as a day only service. Nevertheless, there is presently no information available that can determine the true extent of the potential adjacent channel interference during night operation. Future testing and allocation studies may provide the needed information for the commission to consider some form of night service authorization.

Unlike the disadvantage that presently exist for daytime only stations, an IBOC daytime authorization would apply equally to all stations, fulltime and daytime. With the information known today, it would appear that the commission has two choices; authorize a day only service for AM or no IBOC service for AM. Susquehanna believes that without IBOC, the AM band has little hope for the future.

Susquehanna understands that without night service, AM IBOC, standing alone, may have little chance of success but we also believe that neither AM IBOC nor FM IBOC will be an overnight success. IBiquity has often stated that their AM and FM technology are interlaced in such a manner that all receiver chip sets will provide for the reception of both AM and FM IBOC. It is possible that many AM stations will decide to hold off on implementing IBOC until FM stations have paved the way and created the demand for IBOC receivers. IBOC service, even day-only IBOC service, could be very attractive to AM stations once there are sufficient receivers in the marketplace.

In summery, Susquehanna supports the NRSC recommendation that the iBiquity AM IBOC system " should be authorized by the FCC as an enhancement to AM broadcasting in the US for day-time only service". Although the potential for an increase in adjacent channel interference does exist for some stations, the increased quality and durability of the IBOC signal can restore the Standard Broadcast Band (AM) to the position it once held as a provider of high quality audio service to the listening public.

Respectfully Submitted,

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